

HEARING DATE: December 15, 2010, at 10:00 a.m.
OBJECTION DEADLINE: November 15, 2010, at 4:00 p.m.

CLEARY GOTTlieb STEEN & HAMILTON LLP
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Attorneys for Defendants HSBC Private Bank (Suisse) SA, HSBC Securities Services (Luxembourg) SA, HSBC Bank USA NA, HSBC Private Bank (C.I.) Limited (sued here as HSBC Private Bank (Guernsey) Ltd), HSBC Private Banking Nominee 1 (Jersey) Limited (sued here as FS/HSBC Private Banking Nom), Robinson & Co., Caceis Bank Luxembourg, CDC IXIS, Citibank NA London, Citibank (Switzerland) AG, Citigroup, Citivic Nominees Limited, BNP Paribas Securities Services Luxembourg, BGL BNP Paribas (sued here as BNP Paribas Luxembourg SA), BNP Paribas (Suisse) SA, BNP Paribas (Suisse) SA Ex Fortis, and BNP Paribas (Suisse) SA Private

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 15 Case
)	
Fairfield Sentry Limited, et al.,)	Case No. 10-13164 (BRL)
)	
Debtors in Foreign Proceedings.)	Jointly Administered
)	
Fairfield Sentry Limited (In Official Liquidation),)	
acting by and through the)	
Foreign Representatives thereof,)	
)	
Plaintiffs,)	
)	
-against-)	Adv. Pro. No.10-03633 (BRL)
)	
HSBC Private Bank (Suisse) SA and)	
Beneficial Owners of the Accounts Held in the)	
Name of HSBC Private Bank (Suisse) SA 1-1000,)	
)	
Defendants.)	
)	

**Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,**

Plaintiffs,

-against-

**HSBC Securities Services (Luxembourg) SA and
Beneficial Owners of the Accounts Held in the
Name of HSBC Securities Services
(Luxembourg) SA,**

Defendants.

Adv. Pro. No. 10-03630 (BRL)

**Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,**

Plaintiffs,

-against-

**FS/HSBC Private Banking Nom and
Beneficial Owners of the Accounts Held in the
Name of FS/HSBC Private Banking
Nom 1-1000,**

Defendants.

Adv. Pro. No. 10-03629 (BRL)

Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

Robinson & Co. and Beneficial Owners of the
Accounts Held in the Name of Robinson
& Co. 1-1000,

Defendants.

Adv. Pro. No. 10-03628 (BRL)

Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

HSBC Private Bank (Guernsey) LTD and
Beneficial Owners of the Accounts Held in the
Name of HSBC Private Bank
(Guernsey) LTD 1-1000,

Defendants.

Adv. Pro. No. 10-03631 (BRL)

Fairfield Sentry Limited, et al. (In Official Liquidation), acting by and through the Foreign Representatives thereof,

Plaintiffs,

-against-

Caceis Bank Luxembourg and Beneficial Owners of the Accounts Held in the Name of Caceis Bank Luxembourg 1-1000,

Defendants.

Adv. Pro. No. 10-03624 (BRL)

Fairfield Sentry Limited (In Official Liquidation), acting by and through the Foreign Representatives thereof,

Plaintiffs,

-against-

CDC IXIS and Beneficial Owners of the Accounts Held in the Name of CDC IXIS 1-1000,

Defendants.

Adv. Pro. No. 10-03754 (BRL)

Fairfield Sentry Limited (In Official Liquidation), acting by and through the Foreign Representatives thereof,

Plaintiffs,

-against-

Citibank NA London and Beneficial Owners of the Accounts Held in the Name of Citibank NA London 1-1000,

Defendants.

Adv. Pro. No. 10-03622 (BRL)

Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

Citibank (Switzerland) Zurich, et al.

Defendants.

Adv. Pro. No. 10-03640 (BRL)

Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

Zurich Capital Markets Company and
Beneficial Owners of the Accounts Held in the
Name of Zurich Capital Markets
Company 1-1000 et al.,

Defendants.

Adv. Pro. No. 10-03634 (BRL)

Fairfield Sentry Limited, et al. (In Official Liquidation), acting by and through the Foreign Representatives thereof,

Plaintiffs,

-against-

BNP Paribas Securities Services Luxembourg and Beneficial Owners of the Accounts Held in the Name of BNP Paribas Securities Services Luxembourg 1-1000,

Defendants.

Adv. Pro. No. 10-03627 (BRL)

Fairfield Sentry Limited (In Official Liquidation), acting by and through the Foreign Representatives thereof,

Plaintiffs,

-against-

BNP Paribas Luxembourg SA and Beneficial Owners of the Accounts Held in the Name of BNP Paribas Luxembourg SA 1-1000,

Defendants.

Adv. Pro. No. 10-03626 (BRL)

Fairfield Sentry Limited, et al. (In Official Liquidation), acting by and through the Foreign Representatives thereof,

Plaintiffs,

-against-

ABN AMRO Schweiz AG, et al.

Defendants.

Adv. Pro. No. 10-03636 (BRL)

Fairfield Sentry Limited (In Official Liquidation),
acting by and through the
Foreign Representatives thereof,

Plaintiffs,

-against-

ABN AMRO Schweiz AG, et al.

Defendants.

Adv. Pro. No. 10-03635 (BRL)

**NOTICE OF HEARING ON DEFENDANTS’
MOTION TO REMAND AND FOR ABSTENTION**

PLEASE TAKE NOTICE that a hearing will be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York (the “Court”), Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408 on December 15, 2010, at 10:00 a.m. (Prevailing Eastern Time), or as soon thereafter as counsel may be heard, to consider the Motion to Remand and for Abstention (the “Motion”), filed in the above-captioned actions (the “Actions”) on October 4, 2010, by defendants HSBC Private Bank (Suisse) SA, HSBC Securities Services (Luxembourg) SA, HSBC Bank USA NA, HSBC Private Bank (C.I.) Limited, HSBC Private Banking Nominee 1 (Jersey) Limited, Robinson & Co., Caceis Bank Luxembourg, CDC IXIS, Citibank NA London, Citibank (Switzerland) AG, Citigroup, Citivic Nominees Limited, BNP Paribas Securities Services Luxembourg, BGL BNP Paribas, BNP Paribas (Suisse) SA, BNP Paribas (Suisse) SA Ex Fortis and BNP Paribas (Suisse) SA Private (collectively, the “Moving Defendants”).

PLEASE TAKE FURTHER NOTICE that by this Motion the Moving Defendants seek entry of an order pursuant to Sections 1334(c)(1) and (2), 1447 and 1452(b) of Title 28 of the United States Code (the “Bankruptcy Code”) and Rule 9027 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), remanding the Actions to New York State Supreme Court for New York County, and/or abstaining from the Actions.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Motion shall be in writing, shall state with particularity the reasons for the objection or response, and shall be filed with the Court, with a courtesy copy delivered to the chambers of the Honorable Burton R. Lifland, United States Bankruptcy Judge, and served upon counsel to the Moving Defendants, Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, New York 10006, Attention: Evan A. Davis, so as to be filed and received by 4:00 p.m. (Prevailing Eastern Time) on or before November 15, 2010. Only those objections which have been timely filed and served may be considered by the Court at the Hearing.

PLEASE TAKE FURTHER NOTICE that if you fail to respond in accordance with this Notice, the Court may grant the relief demanded by the Motion without further notice or hearing.

Dated: New York, New York
October 4, 2010

CLEARY GOTTlieb STEEN & HAMILTON LLP

By:



Evan A. Davis

Thomas J. Moloney

Lawrence B. Friedman

Carmine D. Boccuzzi Jr.

Breon S. Peace

Attorneys for Defendants HSBC Private Bank (Suisse) SA, HSBC Securities Services (Luxembourg) SA, HSBC Bank USA NA, HSBC Private Bank (C.I.) Limited (sued here as HSBC Private Bank (Guernsey) Ltd), HSBC Private Banking Nominee 1 (Jersey) Limited (sued here as FS/HSBC Private Banking Nom), Robinson & Co., Caceis Bank Luxembourg, CDC IXIS, Citibank NA London, Citibank (Switzerland) AG, Citigroup, Citivic Nominees Limited, BNP Paribas Securities Services Luxembourg, BGL BNP Paribas (sued here as BNP Paribas Luxembourg SA), BNP Paribas (Suisse) SA, BNP Paribas (Suisse) SA Ex Fortis, and BNP Paribas (Suisse) SA Private